UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UMG RECORDINGS, INC., CAPITOL RECORDS, LLC, CONCORD BICYCLE ASSETS, LLC, CMGI RECORDED MUSIC ASSETS LLC, SONY MUSIC ENTERTAINMENT, and ARISTA MUSIC,

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER KAHLE, KAHLE/AUSTIN FOUNDATION, GEORGE BLOOD, and GEORGE BLOOD L.P.,

Defendants.

Case No. 1:23-cv-07133-LGS-JW

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Brewster Kahle dated November 1, 2023, and the accompanying Memorandum of Law dated November 1, 2023, the undersigned hereby move this Court on behalf of Defendants Internet Archive, Brewster Kahle, George Blood, George Blood L.P., and Kahle/Austin Foundation before the Honorable Lorna G. Schofield, in Courtroom 1106 of the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007, for an order granting Defendants' motion to transfer venue pursuant to 28 U.S.C. § 1404(a), and for such other and further relief as the Court deems just and proper.

Dated: November 1, 2023 New York, New York

Respectfully submitted,

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^{*} Defendants use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.